

JS 44 (Rev. 10/20)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Angeliki M. Rengepes

(b) County of Residence of First Listed Plaintiff Montgomery
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Daniel S. Doyle, Esquire
Brooks, Bradley & Doyle**DEFENDANTS**

Bloomingdale's, Inc. d/b/a Bloomingdale's

County of Residence of First Listed Defendant New York
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☐ 2 U.S. Government Defendant
- ☐ 3 Federal Question (U.S. Government Not a Party)
- ☒ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|---------------------------------------|----------------------------|---|----------------------------|---------------------------------------|
| Citizen of This State | <input checked="" type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input checked="" type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input checked="" type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

U.S.C. Title 28 1332

Brief description of cause:

Non Motor Vehicle Personal Injury

VII. REQUESTED IN COMPLAINT:
☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

 DEMAND \$
 >150,000

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

DOCKET NUMBER

DATE

04/26/2022

SIGNATURE OF ATTORNEY OF RECORD

DANIEL S. DOYLE, ESQUIRE

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ANGELIKI N. RENGEPESES	:	
210 FOXTAIL WAY	:	
LANSDALE, PA 19446	:	NO.
	:	
V.	:	
	:	
BLOOMINGDALE’S, INC. d/b/a	:	
BLOOMINGDALE’S	:	
1000 Third Avenue 59th Street and	:	
Lexington Avenue	:	
New York, NY 10022	:	

COMPLAINT-CIVIL ACTION

Plaintiff, Angeliki N. Rengepes, (“Plaintiff”) by and through attorney Daniel S. Doyle of Brooks, Bradley & Doyle, hereby presents this Civil Action Complaint and, in support thereof, avers as follows:

NATURE OF ACTION

1. The Plaintiff, Angeliki N. Rengepes brings this action to recover monetary damages under supplemental Pennsylvania law claims for negligence.

THE PARTIES

2. Plaintiff, Angeliki N. Rengepes is an adult individual who resides at the above-captioned address.

3. Defendant Bloomingdale’s, Inc. (“Defendant”) is a business with its corporate headquarters at the above-captioned address.

JURISDICTION AND VENUE

4. Jurisdiction is based on diversity of citizenship and amount, U.S.C. Title 28 §1332.

5. Plaintiff is a citizen of Pennsylvania and Defendant is a Corporation with Corporate Offices located in the State of New York, and the matter in controversy exceeds, exclusive of interest and costs, the sum of One Hundred and Fifty Thousand Dollars.

6. Venue is proper under 28 U.S.C. §1391, as the accident occurred in Pennsylvania within this Court's Judicial District.

COUNT I
ANGELIKI RENGEPE'S v. BLOOMINGDALE'S, INC.

7. Plaintiff incorporates by reference the averments stated in paragraphs 1 through 6 as if fully set forth herein at length.

8. On October 28, 2020, Plaintiff Angeliki Rengepes was working as a business invitee at the Bloomingdale's store at the Willow Grove Park Mall at 2400 West Moreland Park Road, Willow Grove, Pennsylvania ("Willow Grove Bloomingdale's").

9. On the above date, Plaintiff Angeliki Rengepes was in the stock room of the store performing when she tripped over a misplaced and difficult to see ladder and sustained serious injury.

10. At all times pertinent hereto, Defendant acted by and through its agents, servants, workmen and/or employees, acting within the scope of their employment.

11. Defendant Bloomingdale's, through its agents, servants, workmen and/or employees, were responsible for the maintenance and safety of the store, the stock room, and its employees at all times pertinent hereto.

12. The negligent condition of the stock room constituted a dangerous and defective condition for business invitees such as Plaintiff because it created a tripping hazard.

13. As a result of Defendant's negligence and carelessness, Plaintiff Angeliki Rengepes tripped and fell hard to the floor, causing her to lose consciousness and to sustain serious injuries.

14. Plaintiff's accident was due solely to the negligence and carelessness of Defendant and was not due to any act or failure to act on the part of Plaintiff.

15. At all times pertinent hereto, Plaintiff was on Defendant's property as a business invitee of Defendant Bloomingdale's.

16. The negligence and carelessness of Defendant Bloomingdale's which caused the accident in question included, but was not necessarily limited to, the following:

- a) creating a dangerous and defective tripping hazard (ladder misplaced and difficult to see) in its stock room and store, and permitting general disarray;
- b) creating a tripping hazard in an area where business invitees such as a Plaintiff would be expected to and/or were required to walk;
- c) permitting a dangerous and defective condition to exist in an area where business invitees such as Plaintiff would be expected to and/or were required to walk;
- d) failing to make the stock room and store safe for its business invitees;
- e) failing to place appropriate barriers, markers and/or other restraining devices to prevent business invitees from tripping;
- f) failing to have proper lighting in the stock room and store;
- g) failing to properly warn business invitees such as Plaintiff of the existence of the tripping hazard that Defendant had created;
- h) failing to remove the tripping hazard within a reasonable time;

i) failing to properly maintain the stock room and store to prevent a hidden and/or unexpected danger to business invitees; and

j) failing to properly monitor the area to ensure that there were not hidden and/or unexpected dangers to business invitees.

17. As a direct result of the negligence, and carelessness of Defendant, Plaintiff suffered multiple severe injuries, including, but not necessarily limited to injury to her head, neck, spine, back, shoulders and body in general, some or all of which may be permanent.

18. As a direct result of the negligence, and carelessness of Defendant, Plaintiff suffered injury resulting in several ongoing conditions, including, but not necessarily limited to headaches, sensitivity to light and sound, impaired vision and other deficits, some or all of which may be permanent.

19. As a direct and proximate result of the negligence and carelessness of Defendant as described above, Plaintiff experienced pain and suffering, limitation, discomfort, anxiety, and a diminution of life's enjoyment and will continue to do so in the future.

20. As a result of the negligence, and carelessness of Defendant, Plaintiff has been required to incur expenses for reasonable and necessary medical treatment for her injuries, and will continue to require medical treatment and incur medical expenses into the future.

21. As a result of the negligence, and carelessness of Defendant, Plaintiff has suffered and will continue to suffer severe physical and mental pain, disfigurement,

disability, limitation, incapacity, mental anguish, embarrassment and humiliation, some or all of which may be permanent in nature.

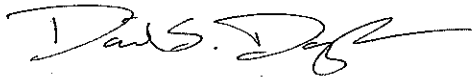
22. As a result of the negligence, and carelessness of Defendant, Plaintiff suffered, and continues to suffer wage loss and a diminished earning capacity.

23. As a result of the negligence and carelessness of Defendant, Plaintiff is subject to a lien for worker's compensation benefits paid.

24. Plaintiff hereby makes a demand for a jury trial of twelve.

WHEREFORE, Plaintiff demands judgment against Defendant in an amount in excess of one hundred and fifty thousand dollars, plus costs, delay damages and all other damages to be determined at the time of trial.

BROOKS, BRADLEY & DOYLE

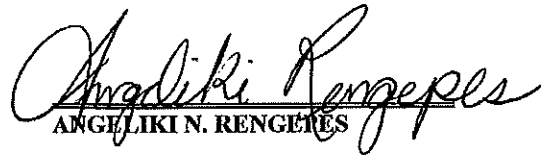


BY:

DANIEL S. DOYLE, ESQUIRE
ATTORNEY FOR PLAINTIFF
PA. ATTORNEY I.D. No. 77989
21 W. Second Street
Media, PA 19063
(610) 565-4800
FAX (610) 565-2551
Dan.Doyle@bbdlawfirm.com

VERIFICATION

Angeliki N. Rengepes avers that she is the Plaintiff herein and as such verifies that the information contained in the foregoing is true and correct to the best of her knowledge, information, and belief. This Verification is made subject to the penalties of 18 Pa. C.S. 4904 relating to unsworn falsification to authorities.


ANGELIKI N. RENGEPES

DATE:

4/25/22

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

DESIGNATION FORM

(to be used by counsel or pro se plaintiff to indicate the category of the case for the purpose of assignment to the appropriate calendar)

Address of Plaintiff: 210 Foxtail Way, Lansdale, PA 19446
1000 Third Ave 59th St and Lexington Ave, New York, NY
 Address of Defendant: Bloomingdale's, 2400 West Moreland Park Rd, Willow Grove,
 Place of Accident, Incident or Transaction: _____

RELATED CASE, IF ANY:

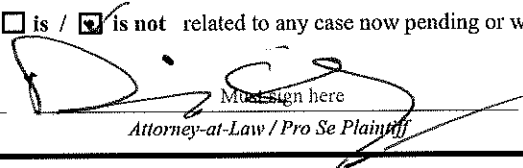
Case Number: _____ Judge: _____ Date Terminated: _____

Civil cases are deemed related when **Yes** is answered to any of the following questions:

- | | | |
|--|------------------------------|--|
| 1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action of this court? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual? | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

I certify that, to my knowledge, the within case ☐ is / ☒ is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 04/26/2022



 Attorney-at-Law / Pro Se Plaintiff

77989

Attorney I.D. # (if applicable)

CIVIL: (Place a ✓ in one category only)

A. Federal Question Cases:

- ☐ 1. Indemnity Contract, Marine Contract, and All Other Contracts
- ☐ 2. FEELA
- ☐ 3. Jones Act-Personal Injury
- ☐ 4. Antitrust
- ☐ 5. Patent
- ☐ 6. Labor-Management Relations
- ☐ 7. Civil Rights
- ☐ 8. Habeas Corpus
- ☐ 9. Securities Act(s) Cases
- ☐ 10. Social Security Review Cases
- ☐ 11. All other Federal Question Cases
(Please specify): _____

B. Diversity Jurisdiction Cases:

- ☐ 1. Insurance Contract and Other Contracts
- ☐ 2. Airplane Personal Injury
- ☐ 3. Assault, Defamation
- ☐ 4. Marine Personal Injury
- ☐ 5. Motor Vehicle Personal Injury
- ☒ 6. Other Personal Injury (Please specify): Non MVA Personal Injury
- ☐ 7. Products Liability
- ☐ 8. Products Liability - Asbestos
- ☐ 9. All other Diversity Cases
(Please specify): _____

ARBITRATION CERTIFICATION

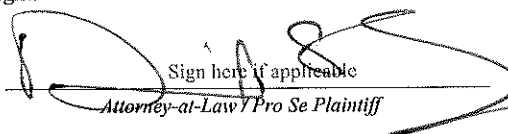
(The effect of this certification is to remove the case from eligibility for arbitration.)

I, Daniel S. Doyle, counsel of record or pro se plaintiff, do hereby certify:

☒ Pursuant to Local Civil Rule 53.2, § 3(c) (2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs:

☐ Relief other than monetary damages is sought.

DATE: 01/26/2022



 Attorney-at-Law / Pro Se Plaintiff

77989

Attorney I.D. # (if applicable)

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CASE MANAGEMENT TRACK DESIGNATION FORM

Angeliki M. Kengepes :

CIVIL ACTION

v. :

Bloomingdale's, Inc. d/b/a
Bloomingdale's :

NO.

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ()
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ()
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ()
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ()
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ()
- (f) Standard Management – Cases that do not fall into any one of the other tracks. (✓)

<u>4/26/2022</u>	<u>Daniel S. Doyle, Esq.</u>	<u>Plaintiff</u>
Date	Attorney-at-law	Attorney for
<u>610-565-4800</u>	<u>610-565-2551</u>	<u>dan.doyle@BBDlawfirm.com</u>
Telephone	FAX Number	E-Mail Address

(Civ. 660) 10/02

**Civil Justice Expense and Delay Reduction Plan
Section 1:03 - Assignment to a Management Track**

- (a) The clerk of court will assign cases to tracks (a) through (d) based on the initial pleading.
- (b) In all cases not appropriate for assignment by the clerk of court to tracks (a) through (d), the plaintiff shall submit to the clerk of court and serve with the complaint on all defendants a case management track designation form specifying that the plaintiff believes the case requires Standard Management or Special Management. In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a case management track designation form specifying the track to which that defendant believes the case should be assigned.
- (c) The court may, on its own initiative or upon the request of any party, change the track assignment of any case at any time.
- (d) Nothing in this Plan is intended to abrogate or limit a judicial officer's authority in any case pending before that judicial officer, to direct pretrial and trial proceedings that are more stringent than those of the Plan and that are designed to accomplish cost and delay reduction.
- (e) Nothing in this Plan is intended to supersede Local Civil Rules 40.1 and 72.1, or the procedure for random assignment of Habeas Corpus and Social Security cases referred to magistrate judges of the court.

**SPECIAL MANAGEMENT CASE ASSIGNMENTS
(See §1.02 (e) Management Track Definitions of the
Civil Justice Expense and Delay Reduction Plan)**

Special Management cases will usually include that class of cases commonly referred to as "complex litigation" as that term has been used in the Manuals for Complex Litigation. The first manual was prepared in 1969 and the Manual for Complex Litigation Second, MCL 2d was prepared in 1985. This term is intended to include cases that present unusual problems and require extraordinary treatment. See §0.1 of the first manual. Cases may require special or intense management by the court due to one or more of the following factors: (1) large number of parties; (2) large number of claims or defenses; (3) complex factual issues; (4) large volume of evidence; (5) problems locating or preserving evidence; (6) extensive discovery; (7) exceptionally long time needed to prepare for disposition; (8) decision needed within an exceptionally short time; and (9) need to decide preliminary issues before final disposition. It may include two or more related cases. Complex litigation typically includes such cases as antitrust cases; cases involving a large number of parties or an unincorporated association of large membership; cases involving requests for injunctive relief affecting the operation of large business entities; patent cases; copyright and trademark cases; common disaster cases such as those arising from aircraft crashes or marine disasters; actions brought by individual stockholders; stockholder's derivative and stockholder's representative actions; class actions or potential class actions; and other civil (and criminal) cases involving unusual multiplicity or complexity of factual issues. See §0.22 of the first Manual for Complex Litigation and Manual for Complex Litigation Second, Chapter 33.